

Exhibit A

Proposed Order

**IN THE UNITED STATES BANKRUPTCY COURT
FOR THE DISTRICT OF DELAWARE**

In re

Lordstown Motors Corp., *et al.*,¹

Debtors.

Chapter 11

Case No. 23-10831 (MFW)

(Jointly Administered)

Re: D.I. 131 & 259

ORDER APPROVING STIPULATION EXTENDING REPLY DEADLINE

Upon consideration of the *Stipulation Extending Reply Deadline* (the “Stipulation”)² attached hereto as **Exhibit 1**; and the Court having determined that good and adequate cause exists for approval of the Stipulation;

IT IS HEREBY ORDERED THAT:

1. The Stipulation is approved.
2. The deadline by which Foxconn may file a reply in support of the Motion is hereby extended to August 25, 2023, at 4:00 p.m. (ET).
3. Except as specifically set forth herein, all rights, claims and defenses of the Parties shall be fully reserved and preserved.

¹ The debtors and the last four digits of their respective taxpayer identification numbers are: Lordstown Motors Corp. (3239); Lordstown EV Corporation (2250); and Lordstown EV Sales LLC (9101) (collectively, the “Debtors”). The Debtors’ service address is 27000 Hills Tech Ct., Farmington Hills, MI 48331.

² Capitalized terms not defined herein shall have the meaning ascribed to such terms in the Stipulation.

Exhibit 1

Stipulation

**IN THE UNITED STATES BANKRUPTCY COURT
FOR THE DISTRICT OF DELAWARE**

In re

Lordstown Motors Corp., *et al.*,¹

Debtors.

Chapter 11

Case No. 23-10831 (MFW)

(Jointly Administered)

Re: D.I. 131 & 259

STIPULATION EXTENDING REPLY DEADLINE

Lordstown Motors Corp., Lordstown EV Corporation, and Lordstown EV Sales LLC (collectively, the “Debtors”), on the one hand, and Hon Hai Precision Industry Co., Ltd. (a/k/a Hon Hai Technology Group), Foxconn EV Technology, Inc., and Foxconn EV System LLC (collectively, the “Movants” or “Foxconn” and together with the Debtors, the “Parties”)², on the other hand, by and through their respective undersigned counsel, hereby stipulate and agree (the “Stipulation”) as follows:

WHEREAS, on July 20, 2023, Foxconn filed the *Motion of Hon Hai Precision Industry Co., Ltd. (a/k/a Hon Hai Technology Group), Foxconn EV Technology, Inc., and Foxconn EV System LLC to Dismiss, or, in the Alternative, Convert the Bankruptcy Cases* (D.I. 131) (the “Motion”), seeking the dismissal of the chapter 11 cases of the Debtors for cause, or, in the

¹ The debtors and the last four digits of their respective taxpayer identification numbers are: Lordstown Motors Corp. (3239); Lordstown EV Corporation (2250); and Lordstown EV Sales LLC (9101) (collectively, the “Debtors”). The Debtors’ service address is 27000 Hills Tech Ct., Farmington Hills, MI 48331.

² The Movants are limited to those entities named in the Debtors’ Adversary Complaint that are subject to the jurisdiction of this Court. At the appropriate time and if necessary, Foxconn will seek relief for those entities that are without the Court’s jurisdiction.

alternative, converting the chapter 11 cases to cases under chapter 7 of the Bankruptcy Code in the United States Bankruptcy Court for the District of Delaware (the “Bankruptcy Court”);

WHEREAS, at the hearing on August 15, 2023, the Court scheduled the Motion to go forward on August 28, 2023, at 10:30 a.m. (ET); and

WHEREAS, under rule 9006-1 of the Local Rules of Bankruptcy Practice and Procedure of the United States Bankruptcy Court for the District of Delaware (the “Local Rules”), the deadline for Foxconn to file a reply (the “Reply Deadline”) would be August 23, 2023 at 4:00 pm. (ET). The Debtors and Foxconn have agreed to extend the Reply Deadline to August 25, 2023, at 4:00 p.m. (ET), as set forth herein.

NOW, THEREFORE, in consideration of the foregoing recitals, the Parties, intending to be legally bound, hereby stipulate and agree as follows:

1. The above recitals are true and correct and are incorporated by reference.
2. The Reply Deadline shall be extended to August 25, 2023, at 4:00 p.m. (ET).
3. All other applicable deadlines and obligations under the Local Rules, the Federal Rules of Civil Procedure, and the Federal Rules of Bankruptcy Procedure shall apply.

[Remainder of page intentionally left blank]

Dated: August 18, 2023
Wilmington, Delaware

/s/ Cory D. Kandestin

RICHARDS, LAYTON & FINGER, P.A.

Kevin Gross (No. 209)
Daniel J. DeFranceschi (No. 2732)
Paul N. Heath (No. 3704)
Amanda R. Steele (No. 5530)
Jason M. Madron (No. 4431)
Cory D. Kandestin (No. 5025)
One Rodney Square
920 N. King Street
Wilmington, DE 19801
Telephone: (302) 651-7700
Facsimile: (302) 651-7701
Email: gross@rlf.com
defranceschi@rlf.com
heath@rlf.com
steele@rlf.com
madron@rlf.com
kandestin@rlf.com

- and -

WHITE & CASE LLP

Thomas E Lauria (admitted *pro hac vice*)
Matthew C. Brown (admitted *pro hac vice*)
Fan B. He (admitted *pro hac vice*)
200 South Biscayne Boulevard, Suite 4900
Miami, FL 33131
Telephone: (305) 371-2700
tlauria@whitecase.com
mbrown@whitecase.com
fhe@whitecase.com

David M. Turetsky (admitted *pro hac vice*)
1221 Avenue of the Americas
New York, NY 10020
Telephone: (212) 819-8200
david.turetsky@whitecase.com

/s/ Matthew O. Talmo

MORRIS, NICHOLS, ARSHT & TUNNELL LLP

Robert J. Dehney (No. 3578)
Matthew B. Harvey (No. 5186)
Matthew O. Talmo (No. 6333)
1201 North Market Street, 16th Flr.
P.O. Box 1347
Wilmington, DE 19899-1347
Telephone: 302.658.9200
Email: rdehney@morrisnichols.com
mharvey@morrisnichols.com
mtalmo@morrisnichols.com

-and-

PAUL HASTINGS LLP

Matthew M. Murphy (admitted *pro hac vice*)
Matthew Micheli (admitted *pro hac vice*)
Michael C. Whalen
71 South Wacker Drive, Suite 4500
Chicago, Illinois 60606
Telephone: (312) 499-6000
Facsimile: (312) 499-6100
Email: mattmurphy@paulhastings.com
mattmicheli@paulhastings.com
michaelcwhalen@paulhastings.com

-and-

Mike F. Huang
Kevin P. Broughel (admitted *pro hac vice*)
200 Park Avenue
New York, New York 10166
Telephone: (212) 318-6000
Facsimile: (212) 319-4090
Email: mikehuang@paulhastings.com
kevinbroughel@paulhastings.com

Counsel to Foxconn

Jason N. Zakia (admitted *pro hac vice*)
111 South Wacker Drive, Suite 5100
Chicago, IL 60606
Telephone: (312) 881-5400
jzakia@whitecase.com

Roberto Kampfner (admitted *pro hac vice*)
Doah Kim (admitted *pro hac vice*)
RJ Szuba (admitted *pro hac vice*)
555 South Flower Street, Suite 2700
Los Angeles, CA 90071
Telephone: (213) 620-7700
rkampfner@whitecase.com
doah.kim@whitecase.com
rj.szuba@whitecase.com

Counsel to Debtors